

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

X

TODD HORNBERGER, on behalf of himself : Case No.: 4:17-cv-00409 SNLJ
and others similarly situated, :
:
Plaintiff, :
:
vs. :
:
MEDICREDIT, INC. and PARALLON :
BUSINESS SOLUTIONS, LLC, :
:
Defendants. :
:
X

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS AS TO PARALLON BUSINESS SOLUTIONS,
LLC AND/OR MOTION TO STRIKE CLASS ALLEGATIONS AS TO ALL
DEFENDANTS**

Todd Hornberger (“Plaintiff”), by and through his undersigned counsel, respectfully requests a brief extension of time of 10 days—until April 17, 2017—to respond to Medicredit, Inc. and Parallon Business Solutions, LLC’s (collectively, “Defendants”) motion to dismiss as to Parallon Business Solutions, LLC and/or motion to strike class allegations as to all Defendants (“Motion”), and in support states:

1. Defendants filed their Motion on March 29, 2017, seeking dismissal of one defendant and the striking of Plaintiff’s class allegations. ECF Nos. 14-15.
2. So that Plaintiff can adequately respond to the various issues raised in Defendants’ submissions, and can properly consider whether to file an amended complaint that would obviate the need for motion practice on these points, he respectfully requests a brief, 10-day extension to his response deadline.

3. If granted, Plaintiff's response to the Motion would be due on or before April 17, 2017.

4. Plaintiff has not requested any previous extensions of time in this matter, and no party will be prejudiced by the requested extension.

5. Counsel for Plaintiff conferred with counsel for Defendants regarding the relief he now requests, and Defendants consent to the extension of time Plaintiff requests.

WHEREFORE, Plaintiff respectfully requests that this Court extend the deadline for him to respond to Defendants' Motion by 10 days, to April 17, 2017.

Dated: April 4, 2017

/s/ Michael L. Greenwald

Michael L. Greenwald (*pro hac vice*)
GREENWALD DAVIDSON RADBIL PLLC
5550 Glades Road, Suite 500
Boca Raton, FL 33431
(561) 826-5477
(561) 961-5684 (Fax)
mgreenwald@gdrlawfirm.com

Anthony LaCroix
LaCROIX LAW FIRM, LLC
406 W. 34th Street, Suite 810
Kansas City, MO 64111
Telephone: 816.399.4380
Tony@lacroixlawkc.com

Counsel for Plaintiff and the proposed classes

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused the foregoing to be filed electronically with the Court's ECF system on April 4, 2017, which will cause a copy to be served on all counsel of record.

/s/ Michael L. Greenwald
Michael L. Greenwald